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WRITER'S DIRECT NUMBER
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August 7, 1996

BY FAX AND HAND DELIVERY

Mary M. Tierney
United States Environmental
Protection Agency
77 West Jackson
Chicago, IL 60606

Re: Lenz Oil Site/FS Report Issues

Dear Ms. Tierney:

Enclosed is a revised table of remedial alternatives and a revised Table 2-6 describing remedial action objectives for the Lenz Oil Site. Both were prepared by ERM-North Central. In addition, as we discussed, please provide us with U.S. EPA's position on the following issues relating to the cleanup at the Site:

- **LNAPL-Contaminated Media.** According to U.S. EPA guidance documents, the various Regions have discretion to determine, on a site-specific basis, the level of contamination which may remain in media containing a RCRA listed waste, below which the media will be deemed non-hazardous. In your August 5, 1996 letter, you appear to take the position that LNAPL-contaminated media will not be considered hazardous if the residual level of risk falls below the 10^{-4} to 10^{-6} target carcinogenic risk range and the 1.0 Hazard Index for non-carcinogenic risks.

  - Are we correct in assuming that these risk assessments may be made after contaminated soils or groundwater are treated to address the listed LNAPL wastes?

  - Is LNAPL-contaminated soil which is treated to a target risk level below 10^{-4}, but above 10^{-6}, considered to be a RCRA-listed waste?

- **Soil Hot Spots**. There are certain soils at the Site which do not contact the LNAPL, but which may exceed the target carcinogenic risk range of 10^{-4} to 10^{-6}.

  - **PCB-Contaminated Soils**. If the contamination is primarily due to the presence of PCBs, must such soils be remediated (by treatment or capping) if their PCB concentrations fall beneath TSCA cleanup levels?

  - **Other Contaminants in the Soils**. Must excavated soils which exceed the 10^{-4} to 10^{-6} target risk range due to contaminants other than PCBs be treated as hazardous wastes?

- **PCB-Contaminated Groundwater**. Filtration and other treatment methods may reduce the target risk posed by the groundwater to a level below 10^{-4}, but above 10^{-6}. Will such treated groundwater be considered a RCRA-listed waste?

- **Soil Cap**. Is a cap (either impermeable or permeable) necessary to cover soils which pose a target risk above 10^{-6} but below 10^{-4}?

- **Soil Risk Levels**. ERM would like to include a statement in the FS Report that, based on an application of TACO procedures, soils located in the proximity of sample SB01 (0-5 ft.), SB07 (5-9 ft.), and SB15R (4.5-9.5 ft.) do not pose a risk to human health and the environment and therefore do not need to be remediated. As you know, PRC calculated a carcinogenic target risk above 10^{-4} for these soils based on an overly conservative estimate of inhalation of VOCs from excavated soils. It is our understanding that the Agency would not object to such a statement since the risk calculation under TACO procedures is at least two orders of a magnitude lower than the risk calculated by PRC.

- **Definition of the "Site."**

  - The definition of the boundaries of the "Site" may impact various RCRA requirements associated with intra-site movement of LNAPL-contaminated soil, and purge and well development groundwater.

  - Besides the Lenz Oil property, itself, for purposes of RCRA, is the property residing above the LNAPL plume (which includes the adjacent property and Jeans Road) considered to be "on-site"?

Please feel free to call me, Elsie Millano of ERM or John Griggs with any questions you may have regarding these issues. We look forward to talking with you soon.

Very truly yours,

Alan P. Bielawski

cc: John Griggs
Elsie Millano
Mark Chutkow

TABLE 1
PROPOSED REMEDIAL ALTERNATIVES
LENZ OIL SITE, LEMONT, ILLINOIS

Process Options (1)	Alternative Number									
	1	2	3	4	5	6	7	8	9	10
No Action	XX									
Common Activities										
Long-term ground water monitoring		XX	XX	XX	XX	XX	XX	XX	XX	XX
Institutional controls:										
- Fencing to restrict access to the Lenz Oil Property.		XX	XX	XX	XX	XX	XX	XX	XX	XX
- Deed restrictions on construction and ground water use.		XX	XX	XX	XX	XX	XX	XX	XX	XX
Remediation of Unconsolidated Soils										
* Soils exceeding 10^-4 risk, including >10 ppm PCBs (no volatiles or samples >3 ft deep)										
Off-site incineration						XX	XX	XX		
- On-site treatment by thermal desorption and replacement into "new" excavation						XX	XX	XX		
- On-site treatment by thermal desorption and off-site disposal in Subtitle C landfill						XX	XX	XX		
- On-site treatment by thermal desorption and off-site disposal in Subtitle D landfill						XX	XX	XX		
- In situ solidification/stabilization (S/S) (2)						XX	XX	XX		
- On-site treatment by thermal desorption, S/S and replacement into "new" excavation						XX	XX	XX		
* LNAPL-contaminated soils in Areas 1 and 2										
- Off-site incineration		XX	XX					XX	XX	XX
- On-site treatment by thermal desorption and replacement into "new" excavation		XX	XX					XX	XX	XX
- On-site treatment by thermal desorption and off-site disposal in Subtitle C landfill		XX	XX					XX	XX	XX
- On-site treatment by thermal desorption and off-site disposal in Subtitle D landfill		XX	XX					XX	XX	XX
- On-site treatment by thermal desorption, S/S and replacement into "new" excavation		XX	XX					XX	XX	XX
Remediation of LNAPL-contaminated bedrock										
- Off-site incineration									XX	XX
- On-site treatment by thermal desorption and replacement into "new" excavation									XX	XX
- On-site treatment by thermal desorption and off-site disposal in Subtitle C landfill									XX	XX
- On-site treatment by thermal desorption and off-site disposal in Subtitle D landfill									XX	XX
Permeable Cap										
- Asphalt cap over soils exceeding 10^-6 risk		XX	XX	XX	XX	XX	XX	XX	XX	XX
- Concrete cap over soils exceeding 10^-6 risk		XX	XX	XX	XX	XX	XX	XX	XX	XX
- Soil cap over soils exceeding 10^-6 risk (new option)		XX	XX	XX	XX	XX	XX	XX	XX	XX
- Soil cap over soils exceeding 10^-4 risk (new option)		XX (2)	XX (2)	XX (2)	XX (2)				XX (2)	XX (2)
- No cap over soils exceeding 10^-6 risk (new option)		XX	XX	XX	XX	XX	XX	XX	XX	XX
Impermeable Cap										
Multilayer soil cap over soils exceeding 10^-6 risk		XX	XX	XX	XX	XX			XX	XX
LNAPL Recovery										
Active, with ground water recovery										
- Three trenches			XX	XX		XX				
- Three trenches, one line of wells			XX	XX		XX				
Enhanced LNAPL recovery and ground water extraction										
- Surfactants					XX		XX	XX		
- Steam injection					XX		XX	XX		
Containment and passive recovery of LNAPL		XX								
Ground water recovery										XX
Ground water treatment system										
- Oil/water separation, filtration, activated carbon adsorption			XX	XX		XX				XX
To be defined, probably the same above with two filtration units in series and air stripping			XX	XX		XX				XX
- To be defined, probably biological treatment					XX		XX	XX		

Notes:

(1) The treatment and disposal option selected depends on the determination of whether the material is a RCRA waste after treatment.

(2) The soils exceeding the 1x10^-6 risk include the soils exceeding the 1x10^-4 risk and those containing PCBs in excess of 10 ppm. Therefore, if the soils exceeding the 1x10^-6 risk are covered, this option is irrelevant

TABLE 2-6
(Revised August 1996)

REMEDIAL ACTION OBJECTIVES
LENZ OIL SITE
LEMONT, ILLINOIS

Environmental Media	*Remedial Action Objectives*
Soil	Prevent ingestion, dermal contact with, and inhalation of soil having a carcinogenic risk in the range of 10^{-6} to 10^{-4}, or greater. Prevent ingestion, dermal contact with, and inhalation of soil having a noncarcinogenic risk greater than 1. Meet the PCB clean-up policy.
Ground Water	Prevent ingestion, dermal contact with, and inhalation of ground water having a carcinogenic risk in the range of 10^{-6} to 10^{-4}, or greater. Prevent ingestion, dermal contact with, and inhalation of ground water having a noncarcinogenic risk greater than 1. Meet the chronic FWQC for the protection of aquatic life by utilizing the applicable dilution ratio for the discharge of ground water to the Des Plaines River specified in the Baseline Risk Assessment document. Meet the requirements of the Illinois Ground Water Protection Act and the drinking water Maximum Contaminant Levels in 40 CFR 141. Prevent the migration of the contaminated ground water beyond the LNAPL area.
LNAPL	Remove as much of the LNAPL as is technically practicable in a cost-effective way. Prevent the migration of the LNAPL towards the Des Plaines River.

Key:

CFR = Code of Federal Regulations
FWQC = Federal Water Quality Criteria
LNAPL = Light nonaqueous phase liquid
PCB = Polychlorinated biphenyl
USEPA = United States Environmental Protection Agency